UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

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| UNITED STATES OF AMERICA,<br>Plaintiff | ) | |
| v. | ) | No. 13 CR 00059<br>Hon. Amy Berman Jackson |
| SANDRA STEVENS JACKSON,<br>Defendant. | ) | |

**SANDRA STEVENS JACKSON'S SUBMISSION IN AID OF SENTENCING AND WITH RESPECT TO SENTENCING FACTORS SET FORTH IN 18 U.S.C. § 3553**

**INTRODUCTION**

The Advisory Sentencing Guidelines are only a "starting point" and an "initial benchmark" in the determination of a just and appropriate sentence. *See Gall v. United States*, 552 U.S. 38, 49-51 (2007).[1] As directed by the Supreme Court, "after giving both parties an opportunity to argue for whatever sentence they deem appropriate, the district court judge should then consider all of the 3553(a) factors." *Id.* at 49-50. Furthermore, the Supreme Court has held that the Court "may not presume that the guidelines range is reasonable," but should rather "make an individualized assessment based on the facts presented." *Id.*

The statutory factors set forth in 18 U.S.C. § 3553(a) are intended to assist the Court in arriving at a just sentence, "sufficient but not greater than necessary" to achieve the purposes of sentencing. 18 U.S.C. § 3553(a). In this case, a thorough consideration of the § 3553(a) factors yields the conclusion that a sentence of probation[2] would be the just result in this case.

First, Mrs. Jackson's "history and characteristics" present a powerful argument for the exercise of leniency in sentencing. In her professional as well as in her personal

[1] Pursuant to the terms of Mrs. Jackson's February 14, 2013 plea agreement, her Advisory Guideline range is 12-18 months' imprisonment in the event the Court declines to apply to the disputed § 2T1.1(b)(1) adjustment and 18 to 24 months' imprisonment if the Court applies the disputed § 2T1.1(b)(1) adjustment.

[2] The Supreme Court has expressed the view that a sentence of probation is a significant form of punishment. In *Gall*, the defendant's advisory guideline calculation was 30-37 months based on his having participated for seven months in a conspiracy to distribute ecstasy in which he netted over $30,000. In determining that a sentence of probation was sufficient punishment in that case, the Court observed that although a custodial sentence was "qualitatively more severe" than a probationary sentence of the same term, probation is a substantial restriction on an individual's liberty. *Gall*, 552 U.S. at 48. The Court stated, "Offenders on probation are nonetheless subject to several standard conditions that substantially restrict their liberty . . . probationers may not leave the judicial district, move or change jobs without notifying and in some cases receiving permission from their probation officer or the Court. They must report regularly to their probation officer, permit unannounced visits to their homes, refrain from associating with any person convicted of a felony, and refrain from excessive drinking . . . most probationers are also subject to individual 'special conditions' imposed by the Court." *Id.* (internal citations omitted).

life, Mrs. Jackson has devoted herself to taking care of others and concerning herself with their well-being. For her two children, her 13-year-old daughter and her 9-year-old son, Mrs. Jackson has been their anchor, their hope, and their home. After a heart-rending path to motherhood, Mrs. Jackson has never failed to make her children her first priority. Her love for and devotion to her children is without bounds and has resulted in her son and daughter enjoying a deep-seated sense of security and stability even in the midst of their parents' public professions and highly publicized personal struggles. Mrs. Jackson's children need her constant presence in their young lives, particularly as they face the possibility of losing their father's presence. To lose their mother's presence during their childhood would have a dramatic impact on the rest of their lives.

In her role as Alderman for the 7th Ward in Chicago, Mrs. Jackson demonstrated understanding of the critical health and safety issues and needs specific to her predominantly economically disadvantaged constituency. She brought energy, optimism, and a hands-on approach that was both inspiring and transformative for the 7th Ward community. Mrs. Jackson has also made time to minister to numerous individuals in her extended family and to her friends, mentoring individuals seeking to find their place in the world, as well as providing solace and strength to those suffering from hardship.

By all those whose lives she has touched, Mrs. Jackson is always described as a positive force, whose genuine compassion and concern for others has changed and improved their lives. These qualities should inform the critical determination as to any punishment to be meted out in this case.

Second, the nature and circumstances of the offense justify a sentence of probation. Mrs. Jackson has pled guilty to filing false tax returns in violation of 26

U.S.C. § 7206(1).[3] She has accepted and agreed to the government's calculation of $600,000 in income that was not reported on the joint tax returns she filed with her husband, Jesse Jackson, Jr.[4] She has agreed to pay restitution of at least $168,550.01 based on the total joint tax loss from the underreporting of income on her joint tax returns notwithstanding the fact that restitution is generally not available as a separate sentence for tax crimes.[5] She has submitted, per the terms of her plea agreement, financial statements accurately and completely disclosing her assets.[6] The offense conduct in this case has been serious, but so too has been Mrs. Jackson's desire to accept full responsibility for her misconduct and to move forward for the sake of her husband, her children, and her extended family and friends, all of whom continue to rely upon her.

Other factors set forth in 18 U.S.C. § 3553(a), such as concerns of specific and general deterrence, also argue for a sentence of probation in this case.

**A SENTENCE OF PROBATION WOULD BE SUFFICIENT, YET NOT GREATER THAN NECESSARY, TO ACHIEVE ALL OF THE PURPOSES OF SENTENCING SET FORTH IN 18 U.S.C. § 3553(a)(2)**

18 U.S.C. § 3553(a) provides the framework for the imposition of federal sentences. *See United States v. Booker*, 543 U.S. 220, 233-34 (2005). This statute requires courts to give thorough consideration to a number of factors, including the "nature and circumstances of the offense" and factors that focus on the defendant and his or her life history. *Gall*, 552 U.S. at 50; *Kimbrough v. United States*, 552 U.S. 85 (2007); *Pepper v. United States*, 131 S. Ct. 1229, 1233 ("Highly relevant if not essential to the

[3] Sandra Stevens Jackson Plea Agreement at 1.
[4] Government Statement of the Offense ("Govt. Stmt. Offense") at 3.
[5] Sandra Stevens Jackson Plea Agreement at 5, PSR at 16 ¶ 57.
[6] Sandra Stevens Jackson Plea Agreement at 5-6.

selection of an appropriate sentence is the possession of the fullest information possible concerning the defendant's life and characteristics.").

## I. History and Characteristics of the Defendant: 18 U.S.C. § 3553(a)(1)

### A. Family Background and Early Commitment to Mentoring and Community Service

Sandi Jackson was born into a family of eight children[7]—five girls and three boys — in a humble, inner-city neighborhood in Akron, Ohio.[8] Mrs. Jackson's parents were divorced when Sandi was 12 years old, and from that time, her mother took on the responsibility as primary care provider as well as financial responsibility for all six children, working three jobs to support the family.[9] Mrs. Jackson's mother stressed the importance of education and, as the oldest sister, Sandi embraced the message and served as an example to her siblings. Not only did Sandi love to learn, she took pride in both her own education and in teaching others.[10] As set forth in the letter of Shirley-Stevens Wilson, one of Sandi's sisters, Sandi was a great role model to her sisters as well as a positive influence for their home community.[11] Ms. Wilson observed that all four of Sandi's sisters went on to obtain college degrees and to work in fields that serve the public and that a common factor in their success was Sandi's influence.[12] Another of Sandi's sisters, Leslie K. Hill-Ali, wrote that Sandi taught her to be kind and patient with all people and to listen and show empathy with genuine intent to help.[13]

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[7] Three of the children are from Sandi's parents' marriage and the others are step and half siblings from Sandi's father's subsequent relationships and second marriage.
[8] Letter of Rita Stevens Carre at 1.
[9] *Id.*
[10] Letter of Melody Sales at 1.
[11] Letter of Shirley Steven-Jackson at 1.
[12] *Id.*
[13] Letter of Leslie K. Hill-Ali at. 1.

Several of Sandi's cousins have also written to the Court in her support. One cousin, Diamond Cawthan, stated that Sandi inspired her to attend college and law school.[14] Another cousin, Jawana Gauthier Walker, wrote that Sandi's compassionate, giving spirit inspired her to "be a better person."[15] Sandi's mentoring efforts were not restricted to those concerned with higher education. For another cousin, Terry Millender, Sandi's numerous "talks" with him over the years, as well as her "beautiful heart," helped him to turn his life around after being in and out of trouble for many years.[16]

Mrs. Jackson was also a positive role model for other young people in her community. As explained in the letter of Marla Sales, a young woman from Akron for whom Sandi babysat while growing up, Sandi was "a great influence on [her] childhood."[17] Ms. Sales explained that Sandi helped her to develop skills in taking care of her physical appearance and in becoming a "proper young lady" as well as inspiring her drive to attend college.[18] Ms. Sales recalled the day that Sandi came back home after graduating from Bowling Green University as a day that made her proud to be from that neighborhood.[19]

Many of the individuals who wrote to the Court on Sandi's behalf observed that from the time Sandi was a teenager, she was interested in helping to improve the lives of those in her community. An elder relative, Barbara Johnson, wrote of Sandi's early involvement in volunteering in community outreach programs and in encouraging friends

[14] Letter of Diamond Cawthan at 1.
[15] Letter of Jawana Gauthier Walker at 1.
[16] Letter of Terry Millender at 1.
[17] Letter of Marla D. Sales at 1.
[18] *Id.*
[19] *Id.*

and families to become interested in the programs as well.[20] Faith Shipp, a friend of Sandi's from junior high school, also attested to the fact that from an early age, Sandi had a flair for helping others and "impacting people in a real and positive way."[21] When an urban city high school needed to raise money, Sandi led the charge and spearheaded a production of *The Wiz* in which Sandi played the lead.[22] Sandi lobbied for other people to join in the production and for a longer run time than was originally planned.[23] Her efforts resulted in the school meeting and exceeding its fund-raising goals.[24]

Sandi's outward focus continued in her college and post-college years. When she was selected as Miss Bowling Green at Bowling Green University, the first African American woman to hold that position, Sandi used her title and position to positively impact other students.[25] Even in the midst of competition, Sandi encouraged and inspired her competitors.[26] After Sandi graduated from college, she took a job at a television station in Ohio and used her voice to stand up for those less fortunate and to make a positive impact on the community.[27]

**B. Devotion to Family and Friends**

Many of Mrs. Jackson's family members and friends shared stories of Sandi's unfailing devotion to those who needed her help. When an elder aunt was diagnosed with pancreatic cancer, Sandi spent countless hours researching alternative treatments and financial resources and personally reached out to the Cancer Treatment Center in Chicago

[20] Letter of Barbara Johnson at 1.
[21] Letter of Faith Shipp at. 1.
[22] *Id*.
[23] *Id*.
[24] *Id*.
[25] *Id.*
[26] Letter of Lisa Burton at 1.
[27] Letter of Faith Shipp at 1.

to assist her aunt in obtaining treatment.[28] Sandi also opened her home in Chicago to her uncle and cousins during her aunt's treatments, easing their burden and allowing them to spend time with their wife and mother.[29]

When a teenage cousin was in a fatal car accident, Sandi rushed home to Akron, Ohio, and offered unwavering support.[30] While the rest of the family was frozen into inaction by stress and grief, Sandi stepped in to make all of the necessary funeral arrangements as well as to serve as a source of strength and inspiration for the entire family in an incredibly difficult time.[31]

On numerous other occasions, Sandi made herself available to assist countless other cousins with college, career, and life choices.[32] Sandi was always there any time that a family member needed advice or a place to stay.[33] As one of Sandi's aunts observed, "no matter how big Sandi has gotten or how far she has gone, she has never forgotten her family."[34]

Sandi has also been present to her friends in their times of need. When a friend worked on her first national campaign—the 1996 Clinton/Gore presidential campaign—Sandi was one of the few people who reached out to her to show her the ropes. Unlike others, Sandi was never haughty or self-important.[35] When the friend became pregnant, Sandi supported her throughout her pregnancy and was there to witness the birth of her daughter.[36] This friend found Sandi's support to be remarkably selfless because she was

[28] Letter of Pam Northern at 2.
[29] *Id*.
[30] *Id*.
[31] *Id*.
[32] *Id*.
[33] Letter of Jonathan Stevens at 1.
[34] Letter of Pam Northern at 1-2.
[35] Letter of Rosemary Suggs-Evans at 1.
[36] *Id*.

aware that at the same time Sandi was trying to become pregnant herself, but was encountering tremendous difficulties, including a series of miscarriages.[37] When, at age two months, the friend's daughter started having seizures and was admitted to Children's National Medical Center, Sandi immediately came to the hospital, food in hand, and stayed all day to support her friend and to make everyone feel better.[38] These examples of selfless devotion to friends and family are illustrative of Sandi's profound warmth and kindness.

### C. Mrs. Jackson's Tragic Road to Motherhood

Those who knew Sandi growing up had no doubt that she was destined to be a mother. As she babysat for her own younger cousins as well as for friends and neighbors, Sandi displayed a loving, caring manner that convinced those who observed her that she would one day make a wonderful mother to her own children.[39] For Sandi, however, the path to motherhood was far from easy. Sandi had a difficult time getting pregnant, suffering a series of heartbreaking miscarriages in the late 1990s. Finally, in 1998, Sandi became pregnant and was able to get past the first risky trimester.[40] She was into her fifth month and was ecstatic, discussing with close friends that she had finally made it over the hurdle.[41] But she had not. Sandi's son Lee Louis Jackson was born on August 28, 1998, a little after Sandi's fifth month of pregnancy.[42] Sandi and Jesse were able to dress and hold him and take photos of him in their arms.[43] But he passed away within a day. Sandi's pain was immeasurable.

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[37] *Id*.
[38] *Id*.
[39] Letter of Melody Sales at 1.
[40] Letter of Rosemary Suggs-Evans at 2.
[41] *Id*.
[42] *Id*.
[43] *Id*.

Having had the benefit of observing Sandi's live birth of her son, doctors concluded that Sandi's pelvic floor was so weak that she would never be able to carry a child to term unless she was put on complete bed rest for the entire nine months.[44] Sandi embraced this information, undaunted by the toll it was sure to take on her personal and professional life. When she became pregnant with her daughter, who is now thirteen, Sandi settled into a full nine months of near complete debilitation. She could not move out of bed on her own for many months and had to be lifted in and out of bed to a wheelchair for the brief periods she was not lying in bed.[45]

Finally, however, Sandi's sacrifice paid off. In March 2000, she was blessed with a healthy baby girl. Her joy was without limit. She set about taking the best possible care of her daughter. This was not easy at times because in addition to the sleeplessness and stress experienced by most new mothers, Sandi had to contend with severe muscle and joint atrophy from the previous nine months.[46] This made it impossible for Sandi to walk unassisted or even to hold her daughter for long periods of time. But as those who observed Sandi attested, she never complained or felt sorry for herself.[47] "Her only concern was to take the best possible care of her baby girl that she loved and treasured so much and for whom she had waited for so very, very long."[48] In September 2003, this time after approximately six months of bed rest for Sandi, Sandi and Jesse Jr. were blessed with a son. In all Sandi suffered a total of six miscarriages, all of which were heartbreaking. However, she has never wavered in her focus on her son and daughter as her miracles and greatest sources of joy.

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[44] *Id*. at 2-3.
[45] *Id*. at 3.
[46] *Id*.
[47] *Id*.
[48] *Id*.

Sandi's children were, from the start, and remain today, her highest priority. When her children were old enough to understand, she showed them pictures of their brother who had preceded them.[49] Finding meaning in the pain she had experienced, Sandi told them that their brother was an angel from God who had been sent to live on earth for just a brief time so that they could be born and could thrive. [50] In this as in so many things, Sandi has been "more grateful for her blessings than she has been sorry for herself for her many tragedies,"[51] a hallmark of her strength of character.

**D. Mrs. Jackson's Devotion to her Children**

Those who have observed Sandi with her children and her "innate mothering spirit"[52] understand that Sandi considers having her children the most fulfilling experience of her life.[53] When people praise her for her professional accomplishments, Sandi is quick to remind them that her greatest reward is "being 'mom.'"[54] Sandi loves her children unconditionally, which is evident to those who observe them together.[55] She is an "impeccable mom" who is "attentive, loving, consistent, [and] very patient," "a breath of fresh air."[56] Sandi devotes her time to helping her children to learn and "instructing them on being kind to others."[57] Sandi's children look up to her for her "spirit" and "know-how"[58] and she, in turn, keeps them grounded.[59]

[49] *Id.*
[50] *Id*.
[51] *Id*.
[52] Letter of Keiana A. Barrett at 1.
[53] Letter of Richard Meadows at 1.
[54] Letter of Deborah Williams at 1.
[55] *Id*.
[56] Letter of Lisa Burton at 1.
[57] Letter of Melodie Sales at 1.
[58] *Id*.
[59] Letter of Vance T. Kimber at 1.

Bonita Parker, who worked as Sandi's Chief of Staff from 2007-2010, and who has known Sandi for well over a decade, wrote of her observations of Sandi's devotion to her children.[60] Ms. Parker attested to the fact that, as "everyone who knows Sandi is clear," "her children are her priority."[61] Sandi "carefully and strategically worked the demands of her career around her children" and succeeded in being "a better mother from a distance than many mothers who are not challenged by a dual residency and a challenging career."[62] "No matter who she was meeting with or what she may have been in the midst of, if her children called she would politely and gracefully excuse herself and take the call. I could hear her whispering sweet endearment such as mommy loves you too and I miss you too. How was your day? I am so proud of you…"[63] And when Sandi came home to her children, Ms. Parker observed, "I've seen them nearly knock her off her feet as they ran into her arms after being away from her. I've heard [Sandi's daughter] inquire about mother/daughter days. I've seen [Sandi's son] hug and kiss on her for hours at a time."[64] "The bond Sandi has with her children is truly heartwarming. The world would be a MUCH better place if more mothers were as devoted to their children as Sandi is."[65] In response to criticisms that have been leveled against Sandi that she has spent too much time on her career at the expense of her family (or, alternatively, too much time with her family at the expense of her constituents), Ms. Parker observed:

> [A]s a role model and friend my life has been altered by [Sandi's] presence. I have observed Sandi's remarkable ability to travel between Chicago and DC every week, be a loving mother, a supportive wife, and a hardworking career woman. Having witnessed all of this first hand on a

[60] Letter of Bonita Parkerat 1.
[61] *Id*.
[62] *Id*.
[63] *Id*.
[64] *Id*.
[65] *Id.*

> day to day basis, I have been astonished and angered over press reports that I have seen accusing Sandi of not spending enough time in her ward – or – equally unfair – not spending enough time with her family. The truth is Sandi both served the people in her ward and took care of her children's every need with strength, compassion, grace, and love. Indeed Sandi has so effectively balanced her roles as a professional and a mother that she has been a personal inspiration to me and someone who has helped me be a better person through her quiet and unassuming example.[66]

Keiana Barrett, who, like Bonita Parker, observed Sandi first-hand in a Chief of Staff position, echoed the same sentiments. Ms. Barrett described Sandi's "hands on parenting style" and wrote that since giving birth to her children, Sandi has "masterfully negotiated extremely taxing work demands and the day-to-day needs of active children; compromising neither."[67] A parent of children who attend the same Washington, D.C. school as do Sandi's children described the Jacksons as a "very tight knit family"[68] and wrote that Sandi was "an irreplaceable member of the school community" and a "dedicated mother."[69] A close family friend described Sandi's devotion to her children as "second to none" and witnessed Sandi "doing homework over the phone and on Skype, preparing meals for the time she was away, rescheduling meetings for parent teacher conferences and praying by phone before bed."[70]

Sandi's son's day care teacher wrote of her direct observations of Sandi's interaction with her children during the two years that she lived in the Jackson home.[71] The teacher, Ms. Thomas, provided details of Sandi's daily interactions with her children that evidence the rich fabric of a vibrant and healthy home life. Ms. Thomas wrote of Sandi,

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[66] *Id.* at 2.
[67] Letter of Keiana A. Barrett at 1.
[68] Letter of Xiomara De Leon at 1.
[69] *Id.*
[70] Letter of Cindy Morgan-King at 1.
[71] Sandi opened her home to Ms. Thomas when she needed a place to live during her teaching engagement.

> She accepted the responsibilities that come along with motherhood. She made sure that her children had a night-time routine, that consist[ed] of eating a balanced meal, doing their homework, taking their baths and having story time. Their morning routine was equally established too, Sandi would enter her children's room and awaken them with a gentle massage, stroking every limb on their body with her warm hands, telling them how much she loved them. She would inform me to open the blinds slightly for she did not want the bright sun light to affect their sleepy eyes. After waking them, she bonded with them separately and she shared with them the events of the day. While they got ready for school, she would prepare their breakfast, pack their lunches and sit with them to engage them in table talk. It was at this time she would praise them, encourage them to be their best, be strong, and to be independent. She taught her children everything especially how to smile and be calm if they were facing a problem.

[redacted], when Sandi resigned from her position as Alderman, she has been able to spend all of her time with her son and daughter. Sandi has taken full advantage of this time with her family, taking her children to school and picking them up from school each day as well as attending their various after-school activities.[72] Sandi has worked hard to try to maintain a sense of normalcy for her children in what has been a tumultuous time for the family.[73] She spends the entirety of her weekend with her son and daughter when they are not in school and has tried to keep everyone's mind off the criminal case against her and her husband and all the stress and uncertainty it has engendered.[74]

**E. Mrs. Jackson's Children Need Their Mother's Constant Presence**

A common theme in the letters submitted to the Court on Sandi Jackson's behalf is the extent to which her two children, now nine and thirteen, need her constant presence in their lives—particularly as they face the possibility of being deprived of the presence of their father. A neighbor of Sandi's for the past 15 years wrote of Sandi's children

[72] Letter of Pam Northern at 1.
[73] *Id.*
[74] *Id*.

being at critical ages in development, when they most need their mother to guide and to nurture them.[75] An aunt agreed that the children are at tender ages when a mother's presence is most needed.[76] A cousin with 40 years of experience working with emotionally disturbed adolescents, who witnessed the effects on children of their parents being unavailable, expressed concern that the impact of the Jackson children of losing both their mother and their father would be "devastating" and could have "irreversible consequences."[77] A friend who has had the benefit of observing Sandi's day-to-day interactions with her children first-hand expressed the same concerns, explaining that Sandi's children love and depend upon her and opining that "their lives will never be the same if [Sandi] is taken from them, even for a brief moment in time."[78]

Many of the individuals who submitted letters to the Court expressed concern about the toll the criminal case against their mother and father have already taken on the Jackson children. Long-time family friend of the extended Jackson family, Dwain J. Kyles, wrote that the children have already been traumatized by the events leading up to the legal actions as well as by "the prospect of losing **both** parents and their entire lives being turned upside down."[79] One of Sandi's sisters wrote that she had witnessed the Jackson children having been deeply affected by the thought and concept that they could lose both their father and their mother.[80] [redacted]

[redacted]

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[75] Letter of Karen Carrington at 1.
[76] Letter of Deborah Williams at 1.
[77] Letter of Richard Meadows at 1.
[78] Letter of Pam Northern at 1.
[79] Letter of Dwain J. Kyles at 3 (emphasis added).
[80] Letter of Rita Stevens Carre at 1.

[redacted]

[redacted]”[81]

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[redacted] The stress of this case has taken a tangible toll on Mrs. Jackson’s children – evidence of their critical need for their mother’s presence, love, and support.

As much as the children need Mrs. Jackson right now, many letter writers have observed that the Jackson children will need their mother even more in the weeks and months to come in the aftermath of this criminal case. Sandi’s concern is that she be present when her children need her to be present to respond to the never-ending questions that follow the case.[85] Although Sandi’s children can only be shielded so much from what other children might say, if Sandi can remain a constant presence to her children, “she will be able to help them to cope with the circumstances and consequences that were not and are not their fault.”[86] Alice Gray, who was herself a mother who had been separated from her children in the aftermath of a publicized criminal case, explained that

[81] Letter of Pam Northern at 1.
[82] PSR at 19 ¶ 85.
[83] PSR at 20-21 ¶ 86.
[84] PSR at 21 ¶ 93.
[85] Letter of Deborah Williams at 1.
[86] *Id*.

the children would likely be ostracized and bullied and would need "the reassurance of a mother's kiss and soothing hands to know that all is well in the world."[87] Mrs. Gray also explained that in her experience, the day that she surrendered to prison was the day that her children commenced serving their sentence.[88]

Given Sandi's demonstrated commitment to her children as well as her personal strength and fortitude in the face of past traumatic events, one can be confident that, if given the opportunity, Sandi will be able to act as an anchor for her children after the criminal case is resolved and to comfort them as they face any and all subsequent effects of the case. Lamill McMorris, President and CEO of Perennial Strategy Group and close personal friend of Sandi's since 1998, who worked side-by-side with the Jackson family for the Rainbow PUSH coalition, wrote of his belief that Sandi will "resiliently tend to the greater needs of the Jackson family and most importantly, to her two young children, given the chance to move forward." It is that chance to move forward in the care and nurturing of her young children that is Sandi Jackson's chief concern and most fervent prayer as she stands before the Court asking for the Court's leniency in her sentencing in connection with this case.

**F. Service to the Community**

In evaluating the appropriate punishment for Mrs. Jackson in this case, her history of service to her community is a critical factor for the Court to consider. Bonita Parker, who served as Sandi's Chief of Staff for four years and has known her for over a decade, wrote of her first-hand observations of Sandi's service as Alderman of the 7th Ward. Mrs. Parker explained that the 7th Ward was one of the most challenging areas in the city

[87] Letter of Alice Gray at 1.
[88] *Id.*

because of its high crime rate, economic challenges arising from the fact that industries had packed up and left, and the substandard status of the schools.[89]

**1. Community-Focused Service**

Ms. Parker described some of Sandi's efforts to improve the 7th Ward community. As Chief of Staff, Ms. Parker witnessed Sandi challenging the police for more patrols in the ward,[90] and working to close down liquor stores or limit their hours of operation.[91] She attended meetings with Sandi in which, ever mindful and respectful of the challenges confronting teachers in Chicago's underserved public schools, Sandi challenged the schools to "improve teacher quality, reinstitute extracurricular activities and improve the infrastructure of the schools." For Sandi, "the children were and have always been her highest priority and Sandi was committed to making sure they had the academic, social, and physical challenges that would allow them to thrive."[92]

It was also under Sandi's tenure that the first and only LEED (Leadership in Energy and Environmental Design) School was built in the ward. The LEED school made use of performance-minded "green" technology to provide a school that was not only more energy efficient, but that resulted in cleaner air for the numerous asthmatic students in the ward.[93] The school also included a nurse's station at which medication could be discretely administered, especially to children with diabetes who needed insulin

[89] Letter of Bonita Parker at 1.
[90] *Id*. Vance Kimber, a first cousin to Mrs. Jackson by marriage, wrote as a 30-year veteran of the Chicago Police Department who worked in the troubled and dangerous Robert Taylor housing project for two of those years. Mr. Kimber wrote that when Sandi ran for Alderman in 2007, she never asked for his help. However, he observed Sandi gaining the support of the police department after she addressed it on community issues. Mr. Kimber also shared the many occasions in which, during Sandi's tenure as Alderman, friends would tell him about Sandi's fantastic attitude in trying to improve upon the lack of employment and business in the community.
[91] *Id*. at 1-2, Letter of Pastor Joseph Cannon at 1. Pastor Cannon also described Sandi's work in bringing about a ward-wide moratorium on the issuance of new liquor licenses.
[92] *Id*. at 2.
[93] Letter of Pastor Joseph Cannon at 2.

on a daily basis.[94] The school featured larger bathroom stalls to allow obese and special needs children to attend to their personal hygiene needs in privacy and with dignity.[95] It was equipped with white boards,[96] a critical educational tool that many students in more well-funded schools take for granted.

As Pastor Cannon explained,

> Sandi's commitment to the youngest members of our disadvantaged communities can be traced to the boundless love and unwavering devotion she has demonstrated for her children. Time after time, Sandi has demonstrated that the standards that she hopes to meet in the care of her own children are the same as the standards….she has worked to provide for the children of the underserved members of our community, suffering as they are from poverty as well as various forms of mental and physical illness. The challenge is enormous and much must fall on the parents themselves. But Sandi has never waivered in identifying what the parents of the community might need and then helping to get them what they need so that their children might succeed and flourish.[97]

A close friend reiterated the opinion: "Not many people are aware of [Sandi's] private struggle to start a family and the many disappointments along the way. Sandi's personal battles only seemed to motivate her to help the children around her even more. There have been toy drives, health services to provide children access to state insurance for health and dental, food pantries, violence prevention, and much more."[98]

An attorney who worked closely with Sandi for many years wrote that Sandi so often looked to her for assistance in addressing legal issues faced by Sandi's constituents that the attorney eventually came to set up a legal clinic in Sandi's ward.[99] Addressing constituent needs and putting people together through force of vision and personality

[94] *Id*.
[95] *Id*.
[96] *Id*.
[97] Letter of Pastor Joseph Cannon at 4.
[98] Letter of Cindy Morgan-King at 1.
[99] Letter of Vickie Pasley at 5.

were, once again, skills unique to Sandi that had an enormously positive impact on the people she served.

Both Sandi's Chief of Staff, Bonita Parker, and Pastor Joseph Cannon also wrote about Sandi's critical role in the process of securing a $98 million developer inspired tax increment financing ("TIF") (the cost of which would not be financed by taxpayers in her ward) for the creation of the Chicago Lakeside Development.[100] This project includes a landmark four-phase development of 600 acres of lakefront property and will include construction of over 12,000 houses, retail establishments, and university buildings. [101] It is anticipated to create nearly 30 years of work.[102] Sandi ensured that the development would inure to the benefit of the people in her ward in need of stable, well-paying jobs by demanding provisions in the project documentation mandating the creation of jobs for people residing in the area.[103] Sandi put her demands into practice by hiring people from her ward onto her own staff and standing by the decision to extend opportunities to the people from her ward even when it caused her personal stress.[104]

As numerous letter writers have explained, one of Sandi's most effective initiatives was the creation of the Seventh Ward Advisory Committees.[105] These committees were comprised of community members, business owners, and residents from within the ward with an interest in the quality of life issues affecting the ward.[106] Each of the committees met several times a month in the space provided by Sandi's office to

[100] *Id*. at 3, Letter of Bonita Parker at 2.
[101] *Id.*
[102] *Id.*
[103] *Id.*
[104] Letter of Vickie Pasley at 5.
[105] Letter of Pastor Elaine Smothers at 1, Letter of Pastor Joseph Cannon at 1.
[106] Letter of Pastor Joseph Cannon at 1.

discuss issues and refer actions to Sandi as Alderman.[107] Sandi followed the recommendations of committee members almost without exception.[108] As explained by Pastor Cannon,

> This was a great display of [Sandi's] governing from the bottom up, not the top down. Sandi recognized the truth – that the people most affected by the issues in the community were those that needed to be most involved in the decision making process. Giving these people a say in the process was not only important in providing excellent well-thought-out solutions to many of the issue[s] affecting our communities, but in empowering community leaders because they had confidence that their voices can and would be heard.[109]

Examples of the many successes engendered by the 7th Ward Advisory Committees include: (1) small business fairs co-hosted by committees and sponsoring city agencies; (2) non-profit workshops, which increased the number of non-profits in the ward by 50%; (3) computer literacy classes for seniors; (4) educational scholarships; (5) a program through which underserved schools in the ward received visits from celebrities and sports figures; (6) adult literacy programs; and (7) bringing more mainstream grocers to underserved areas to replace fast-food offerings with those of fresh fruits and vegetables.[110] Andre Fair, CFO of Omar Medical Supply, Inc., in Chicago, outlined his observation of many of the same contributions Sandi made in her community.[111]

**2. Individual-Focused Service**

As significant as some of Sandi's political accomplishments were for her ward and community, Sandi has "never forgotten that the most important part of her job was

[107] *Id.*
[108] *Id.*
[109] *Id.*
[110] Letter of Pastor Cannon at 1-3.
[111] Letter of Andre K. Fair at 1-2.

the service she could provide to the individuals she encountered."[112] A close friend explained of Sandi, "In the years as a public servant, I have observed Sandi take as much time and care with an elderly woman that was full of complaints as she has with heads of state. Despite the massive amount of people Sandi interacts with, she often remembers names, and makes people feel that she will listen if nobody else will."[113] One particularly poignant example of Sandi's one-on-one interactions with members of her ward was the support she extended to families who had lost children to community gun violence.[114] Chief of Staff Parker wrote, "I went with [Sandi] as she visited the homes of families who lost their children to gun violence. I watched as she wept and prayed with the families and extended real compassion and heartfelt sympathy for their trauma."[115] Sandi also acted as an advocate for these families in reaching out to ministers, pastors, and churches in the area to ask them to work with the families in helping them to heal as well as to help with the cost of holding funeral or memorial services "as she understood that the families wanted but often times could not afford a proper funeral and burial for their children."[116]

In other ways, too, Sandi honored the value of individualized attention to her constituents. Sandi had an open-door policy and would meet with anyone and everyone who wanted to see her.[117] When her Chief of Staff would suggest, in response to large numbers of resulting constituent meetings, that Sandi reschedule or reprioritize some of her constituent meetings, Sandi would politely respond, "Well, B, this is important, put it

[112] *Id.*
[113] Letter of Cindy Morgan-King at 1.
[114] *Id.*
[115] *Id.*
[116] *Id.*
[117] *Id.* at 1.

in this schedule."[118] Sandi worked tirelessly on the Annual Back to School Rally and Picnic at which 500 book bags were given away to underserved children every August.[119] She kissed and hugged nearly every one of the nearly 2,000 community members who came to the Annual Food Basket or Turkey Give Away every Thanksgiving or Christmas.[120] She used her own resources to purchase uniforms for needy children[121] and to assist families with funeral expenses.[122] She helped the Erusle Howard Day Care to provide toys, coats, and book bags for its children at Christmas time.[123] When Sandi met a Pastor who housed a battered women's shelter in his church, she responded to his needs by purchasing robes, slippers, and toiletries for the women, and snacks for the children.[124] She set up regular food donations from Panera Bread, which she personally delivered to the shelter.[125] Sandi also spent time with the women in the shelter, listening to their stories and encouraging them in their struggles.[126]

Former constituent Mellody L. Cathay wrote to the Court about her positive experience with Sandi as her Alderman. Mrs. Cathay explained that she was a 7th Ward homeowner who lived across from a 30-unit apartment building that had been passed along through several owners and that had developed a serious problem with accumulating garbage and the attendant stench and rodent infestation.[127] Mrs. Cathay wrote that she had made a series of 311 calls but that all that was done was to fine the

[118] *Id.*
[119] *Id.*
[120] *Id.*
[121] Pam Northern also wrote about Sandi's personally providing one year's worth of school uniforms for 8-10 underprivileged school children after there was an insufficient response by others in her ward.
[122] *Id.* at 3.
[123] Letter of Isaac Shepherd at 1.
[124] *Id.* at 2.
[125] Letter of Pam Northern at 2.
[126] *Id.*
[127] Letter of Mellody Cathay at 1.

property, which response she found to be useless.[128] Then Mrs. Cathay contacted Alderman Jackson. From the first, Mrs. Cathay explained, Sandi gave her direct instruction about how to solve her neighborhood problems.[129] Sandi invited Mrs. Cathay to attend the 7th Ward community meetings along with various city service personnel.[130] Soon, with the help of Sandi and her staff, Mrs. Cathay's garbage was removed and heavy-duty garbage lids were installed to ameliorate the rodent problem.[131] In Mrs. Cathay's experience, Sandi Jackson confronted her problems with "compassion and dedication" and "was truly an asset" to the community. [132]

Ealy Gaton, a 20-year resident of the 7th Ward, wrote with a similar experience. Before Sandi, Mrs. Gaston observed, nothing was being done in the ward.[133] After Sandi took office, there were, for the first time, sponsored turkey giveaways at Thanksgiving, back-to-school book bags and supplies, free computer workshops, and closings of liquor stores.[134] Mrs. Gaston wrote, "Sandi is an amazing person and a good Alderman. I know because I was there."[135]

Dwain J. Kyles also attested to the individual concern that Sandi demonstrated for the seniors in her ward. Mr. Kyles attended a function for senior citizens with Sandi and observed her as she went to every senior in the room – well over a hundred – "and kneeled at their seats listening intently to what they had to say."[136] Mr. Kyles then saw that Sandi followed up with her staff after the meeting to make sure that participants'

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[128] *Id.*
[129] *Id.*
[130] *Id.*
[131] Id at 2.
[132] *Id.*
[133] Letter of Ealy Gaston at 1.
[134] *Id.*
[135] *Id.*
[136] Letter of Dwain J. Kyles at 2.

needs were each addressed.[137] From others in the room, Mr. Kyles heard of their first-hand experiences with Sandi coming to their aid with getting Social Security claims processed, getting rid of rodents, making sure the alleys were paved and well-lit, and seeing to it that business licenses were expedited.[138]

Cousin Jonathan Stevens offered similar observations when, during a visit to Chicago, he observed Sandi talking to neighbors and community affiliates about the need for neighborhood change.[139] From Mr. Stevens' observations of Sandi's dealings with her constituents, she demonstrated genuine concern for the well-being of those she served and listened to all of their concerns – even those that Mr. Stevens felt to be outrageous.[140] At a development workshop in Baltimore, Mr. Stevens met a group of inner-city principals and found that those from Chicago could not stop singing Sandi's praises.[141] They pledged their support for Sandy and offered their assessment that Sandi had been an excellent role model for them as well as for the young women in their schools.[142] Calvin Fox and Dawn Fuchess, the CEO and Founder of Empowering Men and Women for Recovery II, echoed the sentiment, explaining that Sandi was "an outstanding public figure and role model for our young adults" and that "she has shown leadership throughout the black community and unity."[143]

Keiana Barrett, who also worked as Sandi's Chief of Staff during Sandi's tenure as 7th Ward Alderman, wrote that she "had a front row seat during [Sandi's] constant

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[137] *Id.*
[138] *Id.*
[139] Letter of Jonathan Stevens pat 1.
[140] *Id.*
[141] *Id.*
[142] *Id.*
[143] Letter of Calvin Fox and Dawn Fuchess at 1.

displays of hard work, dutiful public service and tireless commitment to transforming American lives."[144] As explained by Pam Northern,

> The life of someone working in the public eye can often be demanding….Sandi has met this challenge with grace and without question – a testament to her placement of others' needs before her own. Few women of Sandi's stature have done so much for so many people on such a range of important issues – often for no personal compensation and at great personal cost.[145]

Brian Garner, who served as 7th Ward Superintendent during Sandi's tenure and interacted with her on a daily basis, wrote of many occasions on which he witnessed Sandi "initiate strong support and resources to her community."[146] Sandi tried to build on 7th Ward strengths as well as to "come up with solutions for the items that lacked."[147] It was important to Sandi that all her constituents were taken care of, from the community's youth to its seniors, who were given high priority because of their day-to-day vulnerability.[148] Sandi saw to it that her staff supplemented the efforts of the Department of Health and Human Services by conducting their own well-being checks on ward seniors in excessively hot weather and ensuring that they had adequate water.[149] She was the only Alderman in the city who went out personally alongside her staff and volunteers to board up open vacant buildings that were being used for drugs and prostitution.[150] She was, likewise, the only Alderman to put together a cleaning crew to respond to areas in which littering was a major concern.[151] In the aftermath of the economic downturn and market crash in 2008, Sandi put together another task force to respond to the hundreds of

[144] Letter of Keiana A. Barrett at 1.
[145] Letter of Pam Northern at 2.
[146] Letter of Brian Garner at 1.
[147] *Id.*
[148] *Id.*
[149] *Id.*
[150] *Id.*
[151] *Id.*

homes that were abandoned and left unsafe and unkempt.[152] In Mr. Garner's observations, based on his day-to-day interactions with Sandi when she served as Alderman, "she is a remarkable public servant who always put the people first."[153]

Sandi Jackson's strong record of providing effective community leadership to the citizens of her troubled ward, as well as the individual care and concern she displayed for her constituents – particularly the children and the senior citizens who were most in need – illustrate her abiding kindness and generosity of spirit. These characteristics, as well as the countless lives she has improved with her dedication and concern, should appropriately be taken into account in determining a just and appropriate sentence for Mrs. Jackson in this case.

Each and every one of these demonstrated examples of Mrs. Jackson's kind and generous spirit and profound devotion to her constituents, as with her dedication to her children, should appropriately be considered in connection with her sentencing. As observed by the court in *United States v. Adelson:*

> [S]urely, if ever a man is to receive credit for the good he has done, and his immediate misconduct assessed in the context of his overall life hitherto, it should be at the moment of his sentencing, when his very future hangs in the balance. This elementary principle of weighing the good with the bad, which is basic to all the great religions, moral philosophies, and systems of justice, was plainly part of what Congress had in mind when it directed courts to consider, as a necessary sentencing factor, "the history and characteristics of the defendant."

441 F. Supp. 2d 506, 513-14 (S.D.N.Y. 2006).

**G. Challenges Posed By Jesse Jr.'s Mental Illness**

[redacted]

[redacted]

[152] *Id.*
[153] *Id.*

[redacted]

[154] Mr. Kyles explained that his father and the Reverend Jesse Jackson, Sr. had been friends and colleagues for about 50 years and that it was at his family home that Dr. Martin Luther King was to attend dinner on the night of his assassination.
[155] *Id*. pat 2.
[156] *Id.*
[157] *Id.*
[158] *Id*. at 3.
[159] Letter of David Heller, at 1.
[160] *Id.*

[redacted]

[161] The surgery took place in 2005.
[162] *Id.*
[163] *Id.*
[164] *Id.*
[165] *Id.*
[166] *Id.* at 2-3.
[167] *Id.* at 3.
[168] *Id.*

[redacted]

[169] *Id.* at 3.
[170] Letter of Rosemary Suggs-Evans at 3.
[171] *Id.*
[172] *Id.*
[173] *Id.*
[174] *Id.*
[175] *Id.* at 3-4.

[redacted]

[176] Letter of Vickie Pasley at 6.
[177] *Id.*
[178] *Id.*
[179] *Id.* at 7.
[180] *Id.*
[181] *Id.* at 8.
[182] *Id.*
[183] *Id.*
[184] *Id.*
[185] *Id.*

[redacted]

**II. Nature and Circumstances of the Offense: 18 U.S.C. § 3553(a)(1)**

The conduct to which Mrs. Jackson has pled guilty is the failure, between about July 2006 and October 2015, to report approximately $600,000 in income on the joint tax returns that she filed with her husband, Jesse Jackson, Jr. The source of the unreported income was political campaign funds that were not reimbursed for expenses that were personal in nature. Mrs. Jackson entered into a plea agreement with the government on February 20, 2013. This was before the government returned an indictment against her in this case. As set forth in the PSR, Mrs. Jackson submitted a written statement to accompany her plea agreement.[187] Mrs. Jackson stated:

> I acknowledge that I engaged in the conduct described in the Statement of the Offense filed with the Court. I know that what I did was not right and I am very sorry and saddened by my actions, and more specifically, by the impact [that] my actions have had on my family, constituents, and supporters. My 13 year old daughter… and my 9 year old son… will be forever impacted by my actions and I deeply regret that their lives have

[186] *Id*. at 8-9.
[187] PSR at 16, ¶ 59.

> been changed. I accept full responsibility for my conduct and am making amends by pleading guilty and agreeing to pay forfeiture and restitution.[188]

In coming forward pre-indictment and owning up swiftly and fully to the misconduct that gave rise to this case, Mrs. Jackson's level of acceptance of responsibility has been extraordinary. She has conducted herself in precisely the manner in which the government would hope that people would conduct themselves faced with the reality of their own transgressions. As has been recognized by the government, Mrs. Jackson's timely guilty plea permitted the government to avoid preparing for trial and permitted the Court to efficiently allocate its resources.[189] Indeed, in entering into her plea agreement as early as she did, Mrs. Jackson not only spared the government the necessity of preparing for trial, but allowed the government to avoid additional pre-indictment investigation that might have become necessary had there been significant disputes as to the government's monetary figures. In addition, as set forth in the PSR, Mrs. Jackson agreed to restitution in the amount of $168,550.01, notwithstanding the fact that restitution is not generally available for tax offenses.[190]

Also, as recognized by the government, Mrs. Jackson was not aware of all of the instances in which campaign funds were used for personal expenditures. In fact, the government's Statement Of The Offense lists four categorizes of expenditures totaling $71,776.70 that were all made without Mrs. Jackson's knowledge: (1) expenditures at tobacco shops; (2) expenditures for alcohol; (3) dining and entertaining expenses; and (4)

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[188] *Id.*

[189] Sandra Stevens Jackson Plea Agreement at 3.

[190] PSR at 16 ¶ 57. Restitution can be assessed against Mrs. Jackson based on 18 U.S.C. § 3663(a)(3), which provides that restitution can be imposed to the extent that the parties agree to that restitution in a plea agreement.

expenditures on memorabilia.[191] With respect to the other expenses incurred by Jesse Jackson, Jr. and not by Mrs. Jackson, the government concludes that Mrs. Jackson bears responsibility for Mr. Jackson's expenses based on a series of assumptions about what Mrs. Jackson knew or could have foreseen.[192]

Mrs. Jackson has recognized and accepted her personal responsibility for the accuracy of the joint tax returns that she signed as well as for the facts and figures put forth by the government. As a joint tax filer with her husband, and, more significantly, as a co-parent to their two small children, Mrs. Jackson is acutely aware that she and Mr. Jackson are inextricably linked in these proceedings. Her early acceptance of responsibility not only made it possible for the government to better allocate its resources, but had the effect of minimizing the stress and trauma that would have to be suffered by her husband and her children. Mrs. Jackson's determination to promptly and conclusively admit to her misconduct is a powerful argument for the exercise of leniency in her sentence.

**III. Specific and General Deterrence: 18 U.S.C. § 3553(a)(2)(B) &(C)**

The goal of specific deterrence has already been met in this case. As evidenced by her pre-indictment guilty plea and extraordinary acceptance of responsibility, Mrs. Jackson has come to terms with and is deeply remorseful about her misconduct that gave rise to this case. Lamell McMorris wrote that Sandi has "shown great remorse" in connection with this case,[193] a sentiment echoed by Deborah Williams, who wrote that

[191] Gov. Stmt. Offense at 8.
[192] Gov. Stmt. Offense at 7.
[193] Letter of Lamell McMorris at 1.

Sandi "has expressed feelings of extreme remorse" for the hurt and disappointment she has caused and that she is "embarrassed and humiliated."[194]

In January of this year, Mrs. Jackson was forced to resign from her position as Alderman because of this case, a position she held since 2007 and one in which she found great meaning. She has lost the standing and respect she had commanded in the community, as evidenced by the letter from Congressman Danny Davis who wrote that "*until this scandal broke*," Sandi was "basically known as a person of class, style, and character."[195] Not only is it accurate that Mrs. Jackson has suffered an enormous diminishment in reputation based on this case, then, but the fall has been from a significant height of personal and professional stature. This case has, in effect, destroyed all that Mrs. Jackson has been working to build in her professional life since she headed off to Bowling Green University at the age of 19.

For Mrs. Jackson, the most painful effects of this case are those it has wrought on her children. For the past many months, Mrs. Jackson has been living with the fact of the profound pain and suffering of her son and daughter, trauma that she is powerless to rectify or alleviate. As Deborah Williams explained, Mrs. Jackson's children are trying to be resilient, but "the teasing, alienation, and isolation from some friends, coupled with unkind words in print and television media is a lot to endure."[196] For a mother who has spent the last more than decade of her life devoting herself to protecting her children from the sorrow of their father's illness and shielding them from the scrutiny that has often accompanied association with the Jackson family name, this reality is unimaginably heartbreaking.

[194] Letter of Deborah Williams at 1.
[195] Letter of Congressman Danny Davis at 1.
[196] Letter of Deborah Williams at 1.

As observed by Mrs. Williams, the suffering Mrs. Jackson's son and daughter are currently experiencing only reaffirms her profound remorse about the events that gave rise to this case. Mrs. Williams wrote, "What greater reminder about the consequences of one's actions than to have to face your children every day and reassure them that you are truly sorry, will patiently work to gain their forgiveness and trust and that [you] do not want to ever cause them this type of hurt, pain, or disappointment again in their lives."[197] Given the enormous toll this case has taken on Mrs. Jackson's reputation and professional life and, even more significantly, the toll it has taken on her children, there is no chance that Mrs. Jackson would ever again repeat the failings that gave rise to this case.

As for general deterrence, the community has seen and has followed a very public process in which both Mrs. Jackson and Mr. Jackson have both admitted unequivocally to their misconduct and expressed their profound remorse. The public has had a front row seat as the case unfolded and Mr. and Mrs. Jackson resigned from their respective public offices amidst a media storm of criticism and censure. The community has observed as both Mr. and Mrs. Jackson have pledged to repay significant sums of money that will likely take many years if not the rest of their lives. This is not a case in which a defendant comes before the Court continuing to assert his or her innocence and to put the government to their proof on each and every aspect of the charges in the case. It is, rather, a case in which both Mr. and Mrs. Jackson elected to come forward prior to indictment to confess their errors and to attempt to try to rebuild their lives—particularly in their roles as parents to two young children. A strong message has been sent that misuse of campaign funds and tax crimes will result in severe financial and personal consequences as well as the demise of one's professional life. That message need not be

[197] Letter of Deborah E. Williams at 1.

amplified with a prison sentence for a woman who is and has been the primary care giver to two children who depend upon her absolutely for their health and well-being.

**CONCLUSION**

For all of the reasons discussed above, Mrs. Jackson's commitment to her family, her children, and her constituents and the loving concern she has extended time after time to each of these groups, her pre-indictment guilty plea and extraordinary acceptance of responsibility, and the enormity of the personal and professional fall she has already experienced, we ask that the Court impose a sentence of probation. This will not restore Mrs. Jackson to her pre-case professional stature, alleviate the financial burden she now faces, or remove the suffering that her children have already undergone and will continue to undergo in the weeks and months ahead. It will, however, allow Mrs. Jackson to remain present to her children and to devote herself to healing their pain and loss. That she be able to continue in this role for the son and daughter that are, and have always been, her highest priority is Mrs. Jackson's most fervent prayer and hope as she comes before the Court asking the Court for leniency in sentencing.

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Respectfully submitted,

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